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11 *Attorneys for Defendant TikTok, Inc.*

REDACTED

12 **UNITED STATES DISTRICT COURT**  
13 **CENTRAL DISTRICT OF CALIFORNIA**

14  
15 MICHAEL GRECCO  
16 PRODUCTIONS INC.,

17 *Plaintiff,*

18 v.

19 TIKTOK, INC.,

20 *Defendant.*

21 Case No. 2:24-CV-04837-FLA-MAR

22  
23 **DECLARATION OF JEMILI  
24 BOUTROS IN SUPPORT OF  
25 DEFENDANT'S OPPOSITION TO  
26 PLAINTIFF'S MOTION FOR  
27 PARTIAL SUMMARY JUDGMENT**

28 Hon. Fernando L. Aenlle-Rocha

Date: September 26, 2025

Time: 1:30pm

Courtroom: 6B

Filed concurrently with:

- (1) Opposition to Plaintiff's Motion for Partial Summary Judgment;
- (2) Statement of Genuine Disputes of Material Fact;
- (3) Statement of Additional Uncontroverted Facts;
- (4) Declaration of J. Michael Keyes;
- (5) [Proposed] Order

1 I, Jemili Boutros, declare under penalty of perjury under the laws of the United  
2 States and the State of California, as follows:

3 1. I submit this declaration in support of Defendant TikTok, Inc.'s  
4 ("Defendant" or "TTI") Opposition to Plaintiff's Motion for Partial Summary  
5 Judgment. I have personal knowledge of the facts set forth in this declaration and, if  
6 called as a witness, could and would competently testify thereto.

7 2. I am a Senior Intellectual Property Specialist for TikTok U.S. Data  
8 Security, a subsidiary of TTI. As part of my responsibilities and experience, I am  
9 familiar with the TikTok platform and TTI's copyright policies and procedures.

10 3. TTI provides the TikTok platform in the United States. TikTok is an  
11 online entertainment platform that allows users to create, share, and engage with  
12 content posted by other users. TikTok's mission is to inspire creativity and bring joy  
13 to its users. The platform is designed to provide a creative and entertaining forum for  
14 users to express themselves and make connections with other content creators and  
15 users.

16 4. TikTok users engage with the platform by creating and sharing videos  
17 or watching and interacting with videos posted by others. [REDACTED]

18 [REDACTED]  
19 Videos on TikTok relate to a wide variety of topics including politics, educational  
20 content, news, family, comedy, and users' jobs and hobbies.

21 5. TikTok users agree to Terms of Service that govern their use of the  
22 platform. Attached hereto as Exhibit 1 is a true and correct copy of TikTok's Terms  
23 of Service. The Terms of Service are publicly available online at the URL shown in  
24 the exhibit.

25 6. I understand that Plaintiff Michael Grecco Productions ("Plaintiff" or  
26 "MGP") alleges that TikTok users have infringed Plaintiff's copyrights by posting  
27 content to the TikTok platform that includes or incorporates photographs owned by  
28

1 Plaintiff. TTI itself did not create or post any of the allegedly infringing content. I  
2 understand that there are twenty-two photographs at issue in this case, which I will  
3 refer to as the “Asserted Works.”

4       7. TTI takes intellectual property and infringement allegations seriously.  
5 TTI has established policies and procedures for addressing allegations of  
6 infringement. [REDACTED]

7 [REDACTED]  
8 [REDACTED]  
9 [REDACTED]  
10      8. TTI publishes an “Intellectual Property Removal Request Report” on  
11 approximately an annual basis. The Intellectual Property Removal Request Report is  
12 prepared using records kept in the regular course of business and reports, among other  
13 things, the total number of copyright removal requests that TTI received in a six-  
14 month period and the number of reports that resulted in the removal of the reported  
15 content in that same period. I help draft the annual Intellectual Property Removal  
16 Request Reports.

17      9. Attached hereto as Exhibit 2 is a true and correct copy of an Intellectual  
18 Property Removal Request Report published on June 26, 2025, which is publicly  
19 available at the URL shown in the exhibit. As shown in this exhibit, in 2023 TTI  
20 received 462,119 copyright removal requests, 266,321 of which (approximately 58%)  
21 resulted in removal of content. Similarly, in 2024 TTI received 546,651 copyright  
22 removal requests, 368,296 of which (approximately 67%) resulting in removal of  
23 content.

24      10. [REDACTED]  
25 [REDACTED]  
26 [REDACTED]  
27 [REDACTED]  
28

1 [REDACTED]

2 [REDACTED]

3 [REDACTED]

4       11. Each of the alleged acts of infringement identified by Plaintiff are  
5 profile pictures or videos created and posted by TikTok users to TikTok. I understand  
6 that TTI's legal counsel determined that each alleged act of infringement constitutes  
7 fair use. Accordingly, the profile pictures and videos identified by Plaintiff were not  
8 removed from the TikTok platform due to alleged copyright violations. However, a  
9 number of the videos and profile pictures have nevertheless been removed for other  
10 reasons, generally by the users themselves.

11       12. [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 [REDACTED] [REDACTED]

16 [REDACTED]

17       13. TTI operates the e-commerce platform TikTok Shop. Generally  
18 speaking, third-party TikTok Shop sellers can promote and sell products through  
19 TikTok Shop. None of the Asserted Works was used in content associated with  
20 TikTok Shop in any way, such as being used to promote or sell a product.

21       14. TTI did not generate any revenue or profits from the use of the Asserted  
22 Works. TTI did not generate any revenue or profits from the allegedly infringing  
23 content identified by Plaintiff.

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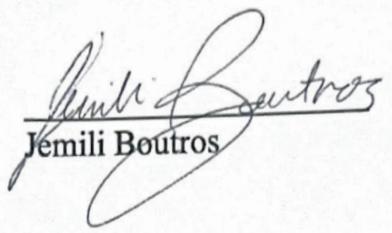
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1 I certify under penalty of perjury under the laws of the United States that the  
2 foregoing is true and correct.

3 This declaration was executed on September 4<sup>th</sup>, 2025 in Los Angeles California

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6 Jemili Boutros  
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## **CERTIFICATE OF SERVICE**

I hereby certify that on September 5, 2025, a true and correct copy of the foregoing was filed electronically using the Court's CM/ECF system, which shall send notification of such filing to all counsel of record. Any counsel of record who has not consented to electronic service through the Court's CM/ECF system will be served by electronic mail.

/s/ Connor J. Hansen

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Connor J. Hansen